

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 21-cr-10104-PBS
	)	
VLADISLAV KLYUSHIN	)	
Defendant	)	
_____	)	

**ASSENTED-TO MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL AND  
REDACT CERTAIN INFORMATION FROM THE PUBLIC FILING**

Now comes the defendant Vladislav Klyushin, by and through undersigned counsel, and hereby respectfully requests leave to file exhibits to his Motion to Suppress under seal and to redact the names of unindicted individuals and account identifying information from the public version of his motion. As grounds and reasons therefore, the exhibits include two affidavits and three search warrants that contain information concerning the investigation of uncharged individuals and other non-public information. Additionally, the motion contains account identifying information and names of uncharged individuals that the defense respectfully believes should not be made public. For all the foregoing reasons, the defense respectfully requests this Honorable Court to allow it to file the exhibits under seal and to redact certain names and account identifying information from the public version of the motion. A redacted version will be filed on the docket and an unredacted version will be submitted to this Honorable Court and the Government.

**WHEREFORE**, the defendant respectfully requests this Honorable Court to grant the instant request.

**COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

The undersigned counsel conferred with counsel for the Government and the Government, by and through AUSA Stephen Frank, assents to this request.

Respectfully Submitted,

/s/ Maksim Nemtsev  
Maksim Nemtsev, Esq.  
Mass. Bar No. 690826  
20 Park Plaza, Suite 1000  
Boston, MA 02116  
(617) 227-3700  
menemtsev@gmail.com

Dated: September 20, 2022

**CERTIFICATE OF SERVICE**

I, Maksim Nemtsev, hereby certify that on this date, September 20, 2022, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

/s/ Maksim Nemtsev  
Maksim Nemtsev